

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ROBERT SPRINGER, et al., individually
and on behalf of all others similarly
situated,

Plaintiffs,

v.

CODE REBEL CORPORATION, et al.,

Defendants.

Case No. 16-cv-3492 (AJN)

**NOTICE OF LEAD COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES, AND COMPENSATORY AWARDS TO LEAD
PLAINTIFFS**

PLEASE TAKE NOTICE that on December 8, 2017 at 10:00 a.m. before the Honorable Alison J. Nathan, United States District Judge for the Southern District of New York, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, the undersigned Co-Lead Counsel will and hereby do move the Court for an order awarding Lead Counsel attorneys' fees in the amount of \$333,333.33, reimbursement of \$13,107.67 in expenses that were incurred in this Action, and an award in the total amount of \$2,000 to Lead Plaintiffs William Tran and Adrian Ybarra to be paid from the Class Settlement Fund. This motion is based upon this notice of motion, the accompanying memorandum of law, the accompanying joint-declaration of Jeremy A. Lieberman and Phillip Kim in support of the motion, the exhibits attached thereto, all prior papers and proceedings herein, and such additional evidence or argument as may be presented at or before the hearing.

A proposed order will be submitted with Lead Counsels' reply papers no later than December 1, 2017, after the deadline for objections has passed.

Dated: November 3, 2017

Respectfully submitted,

POMERANTZ LLP

/s/ Jeremy A. Lieberman

Jeremy A. Lieberman

Justin S. Nematzadeh

Joseph A. Hood, II

600 Third Avenue, 20th Floor

New York, New York 10016

Telephone: (212) 661-1100

POMERANTZ LLP

Patrick V. Dahlstrom

Ten South LaSalle Street, Suite 3505

Chicago, Illinois 60603

Telephone: (312) 377-1181

THE ROSEN LAW FIRM P.A.

Laurence Rosen

Phillip Kim

Kevin Chan

275 Madison Avenue, 34th floor

New York, New York 10016

Telephone: (212) 686-1060

Co-Lead Counsel for Lead Plaintiffs and the Class

GOLDBERG LAW PC

Michael Goldberg

Brian Schall

1999 Avenue of the Stars, Suite 1100

Los Angeles, California 90067

Tel: (800) 977-7401

Additional Counsel for Lead Plaintiffs